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December 20, 2019

Via ECF

The Honorable Steven Tiscione
United States Magistrate Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Riley v. Tastee Pattee, LTD. et al., 18-cv-05562-ENV-ST

Dear Judge Tiscione:

This office represents Plaintiffs in the above-referenced action arising under the Fair Labor Standards Act and the New York Labor Law against Defendants Tastee Pattee, LTD, *et al.* We write, on behalf of all parties, to request a ninety-day extension of time to complete discovery in this matter. As the Court knows, after Plaintiffs filed their Amended Complaint, the parties continued to explore the possibility of settlement. However, those discussion broke down shortly after Defendants served their motion to dismiss the Amended Complaint upon Plaintiffs on December 10, 2019. As a result, additional time is needed to complete discovery and for Plaintiffs to file their anticipated motion for conditional certification. The proposed revised schedule is as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
<i>Fact Discovery</i>	January 7, 2020	April 5, 2020
<i>Conditional Certification Motion</i>	February 21, 2020	May 29, 2020
<i>Status Conference</i>	January 14, 2020	Date set by the Court following close of Fact Discovery (i.e., after April 5, 2020)

All parties consent to this request, and this is the second request for an extension of time to complete discovery. We thank the Court for its time and attention to this matter.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael R. Minkoff", with a long, sweeping horizontal line extending to the right.

Michael R. Minkoff, Esq.

To: All Parties *via* ECF